

**IN THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT  
OF ILLINOIS EASTERN DIVISION**

JULIE HODGE,	)	
	)	1:24-cv-02226
Plaintiff,	)	
	)	
and	)	Judge Jorge L. Alonso
	)	
NORTHEAST ILLINOIS REGIONAL	)	
COMMUTER RAILROAD	)	
CORPORATION, d/b/a METRA	)	
	)	
Defendant.	)	

**JOINT INITIAL STATUS REPORT**

I. Nature of the Case

A. State the basis for federal jurisdiction.

- The jurisdiction of this Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. § 1981 and Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. § 2000e, et seq. (“Title VII”); the judicial code 28 U.S.C. § 1331, § and 1343.

Defendant has asserted that: (1) Plaintiff’s claims are time-barred; and, alternatively, (2)

Plaintiff failed to exhaust her administrative remedies.

B. Briefly describe the nature of the claims asserted in the complaint and the counterclaims and/or third-party claims.

- Plaintiff alleges the following seven (7) counts against the Defendants arising out of her employment:

- Count 1: Title VII - Discrimination on the Basis of Religion
- Count 2: Title VII - Race Discrimination
- Count 3: Section 1981- Race Discrimination
- Count 4: Title VII -Harassment (Religion)
- Count 5: Title VII- Harassment (Retaliation)
- Count 6: Title VII - Gender Discrimination (Harassment)
- Count 7: Title VII-Retaliatory Discharge

Due to a pending motion to dismiss, Defendant has not filed an answer nor any counterclaims.

C. Describe the relief sought.

- Plaintiff seeks (1) a declaratory judgment that the Defendant violated the law; (2) a make whole order; (3) damages and prejudgment interest for monetary and/or economic loss, for all non-monetary and/or compensatory harm; (4) and for fees and costs.

Defendant denies that Plaintiff is entitled to any damages.

D. State whether there has been a jury demand.

- Plaintiff has demanded a trial by jury.

E. List the names of any parties who have not yet been served.

- All parties have been served.

## II. Discovery and Pending Motions

A. Identify any pending motions.

- The Defendant has a filed Motion to Dismiss for Failure to State a Claim. Plaintiff's response is due 6/28/24. Defendant's reply is due 7/12/24.

B. Submit a proposal for discovery and a case management plan that includes the following information: (1) the type of discovery needed, including any potential electronic discovery or bifurcated discovery; (2) the need for any proposed protective orders; (3) a date for Rule 26(a)(1) disclosures; (4) a date for the completion of fact discovery; and (5) whether there will be expert discovery.

- The parties do not anticipate extensive ESI discovery in this matter. Parties will engage in written and fact discovery.
- Plaintiff will jointly seek a protective order.
- Parties shall disclose Rule 26(a)(1) disclosures by August 1, 2024.
- Fact discovery shall close by December 20, 2024
- Parties do not anticipate the need for expert discovery at this time but reserve the right to consider the need for expert discovery after the close of fact discovery.

## III. Settlement and Referrals

1. State whether any settlement discussions have occurred and describe the status of any settlement discussions. (Do *not* provide the particulars of any demands or offers that have been made.)

- Plaintiff made a settlement demand prior to filing complaint. The Defendant has not responded.
2. State whether the parties request a settlement conference at this time before this Court or the Magistrate Judge.
- A settlement conference is not requested at this time.
3. State whether counsel have informed their respective clients about the possibility of proceeding before the assigned Magistrate Judge for all purposes, including trial and entry of final judgment, and whether the parties unanimously consent to the Magistrate Judge's jurisdiction. (Do *not* report whether individual parties have so consented.) The court strongly encourages parties to consent to the jurisdiction of the Magistrate Judge
- Plaintiff has been advised that the Parties may proceed before a Magistrate Judge if there is unanimous consent. There is not unanimous consent to proceed before a Magistrate Judge at this time.

Respectfully Submitted,

/s/ Kendra D. Spearman

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